

Stephanie R. Tatar – State Bar No. 237792

TATAR LAW FIRM, APC

3500 West Olive Avenue, Suite 300

Burbank, California 91505

Telephone: (323) 744-1146

Facsimile: (888) 778-5695

Stephanie@thetatarlawfirm.com

Attorney for Plaintiff Tajzania Wilson

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

TAJZANIA WILSON

Plaintiff,

v.

**EXPERIAN INFORMATION
SOLUTIONS, INC.**

**and
REALPAGE, INC.**

Defendants.

CIVIL ACTION No. 8:15-cv-799

**COMPLAINT FOR VIOLATIONS OF
FAIR CREDIT REPORTING ACT**

DEMAND FOR JURY TRIAL

PRELIMINARY STATEMENT

1. This is an action for damages brought by an individual consumer, Tajzania Wilson, against Experian Information Solutions, Inc. and Realpage, Inc. for violations of the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681, *et seq.*, as amended.

JURISDICTION AND VENUE

2. Jurisdiction of this Court arises under 15 U.S.C. § 1681p, 28 U.S.C. § 1331.

1 3. Venue lies in this district pursuant to 28 U.S.C. § 1391(b).

2 **PARTIES**

3 4. Plaintiff Tajzania Wilson is an adult individual residing in Riverdale,
4 GA.

5 5. Defendant Experian Information Solutions, Inc. (“Experian”) is a
6 business entity and consumer reporting agency that regularly conducts business in
7 the Central District of California, and which has its headquarters and a principal
8 place of business located at 475 Anton Boulevard, Costa Mesa, CA.

9 6. Defendant Realpage, Inc. (“Realpage”) is a credit reporting agency and
10 a reseller of credit information that regularly conducts business in the Central
11 District of California and which has a Registered Agent located at 170 East Town
12 Street, Columbus, OH 43210.

13 **FACTUAL ALLEGATIONS**

14 7. Defendants have been reporting derogatory and inaccurate statements
15 and information relating to Plaintiff and Plaintiff’s credit history to third parties
16 (“inaccurate information”) from at least October 2014 through present. The
17 inaccurate information includes highly derogatory public records and identifying
18 personal information.

19 8. The inaccurate information negatively reflects upon the Plaintiff,
20 Plaintiff’s credit repayment history, Plaintiff’s financial responsibility as a debtor
21 and Plaintiff’s creditworthiness. The inaccurate information consists of accounts
22 and/or tradelines that do not belong to the Plaintiff, and that actually belong to
23 another consumer. Due to Defendants’ faulty procedures, Defendants mixed the
24 credit file of Plaintiff and that of another consumer with respect to the inaccurate
25 information and other personal identifying information.

1 9. Defendants have been reporting the inaccurate information through the
2 issuance of false and inaccurate credit information and consumer credit reports that
3 they have disseminated to various persons and credit grantors, both known and
4 unknown. Defendants have repeatedly published and disseminated consumer
5 reports to such third parties from at least October 2014 through the present.

6 10. Plaintiff's credit report and file has been obtained from Defendants and
7 have been reviewed by prospective and existing credit grantors and extenders of
8 credit, and the inaccurate information has been a substantial factor in precluding
9 Plaintiff from receiving different credit offers and opportunities, known and
10 unknown. Plaintiff's credit reports have been obtained from Defendants by such
11 third parties from at least October 2014 through the present.

12 11. As of result of Defendants' conduct, Plaintiff has suffered actual
13 damages in the form of lost credit opportunities, harm to credit reputation and credit
14 score, and emotional distress including humiliation and embarrassment.

15 12. At all times pertinent hereto, Defendants were acting by and through
16 their agents, servants and/or employees who were acting within the course and
17 scope of their agency or employment, and under the direct supervision and control
18 of the Defendants herein.

19 13. At all times pertinent hereto, the conduct of the Defendants, as well as
20 that of their agents, servants and/or employees, was intentional, willful, reckless,
21 and in grossly negligent disregard for federal laws and the rights of the Plaintiff
22 herein.

23 **COUNT ONE – VIOLATIONS OF THE FCRA**

24 **(Plaintiff v. Defendants)**

25 14. Plaintiff incorporates the foregoing paragraphs as though the same
26 were set forth at length herein.

27 15. At all times pertinent hereto, Experian was a "person" and a "consumer
reporting agency" as those terms are defined by 15 U.S.C. § 1681a(b) and (f).

1 16. At all times pertinent hereto, Realpage was a “person,” a “consumer
2 reporting agency,” and a “reseller” as those terms are defined by 15 U.S.C. §
3 1681a(b), § 1681a(f) and § 1681a(u), respectively.

4 17. At all times pertinent hereto, Plaintiff was a “consumer” as that term
5 is defined by 15 U.S.C. § 1681a(c).

6 18. At all times pertinent hereto, the above-mentioned credit reports were
7 “consumer reports” as that term is defined by 15 U.S.C. § 1681a(d).

8 19. Pursuant to 15 U.S.C. § 1681n and 15 U.S.C. § 1681o, Defendants are
9 each liable to the Plaintiff for willfully and negligently failing to comply with the
10 requirements imposed on a consumer reporting agency of information pursuant to
11 15 U.S.C. § 1681e(b).

12 20. The conduct of Defendants was a direct and proximate cause, as well
13 as a substantial factor, in bringing about the serious injuries, actual damages and
14 harm to the Plaintiff that are outlined more fully above and, as a result, Defendants
15 are liable to the Plaintiff for the full amount of statutory, actual and punitive
16 damages, along with the attorney’s fees and the costs of litigation, as well as such
17 further relief, as may be permitted by law.

18 **JURY TRIAL DEMAND**

19 21. Plaintiff demand trial by jury on all issues so triable.

20 **PRAYER FOR RELIEF**

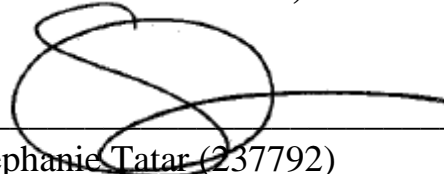
21 WHEREFORE, Plaintiff respectfully prays that relief be granted as follows:

- 22 (a) Actual damages;
23 (b) Statutory damages;
24 (c) Punitive damages;

- 1 (d) Costs and reasonable attorney's fees; and
2 (e) Such other and further relief as may be just and proper.
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5 Date: May 22, 2015

TATAR LAW FIRM, APC

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8 Stephanie Tatar (237792)
9 3500 West Olive Avenue
10 Suite 300
11 Burbank, CA 91505
12 Telephone: (323) 744-1146
13 Facsimile: (888) 778-5695
14 *Attorney for Plaintiff*
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